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No. 80-689

In the Supreme Court of the United States

October Term, 1980

GARY E. WIDMAR, et al.,
Petitioners,

vs.

CLARK VINCENT, et al.,
Respondents.

MOTION OF BIBLE STUDY, [redacted] FOR LEAVE TO FILE BRIEF AMICUS CURIAE [redacted]

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INDEX

MOTION TO FILE BRIEF AMICUS CURIAE 1
TABLE OF AUTHORITIES II
STATEMENT OF INTEREST OF AMICI 5
STATEMENT OF THE CASE 6
REASONS FOR DENYING THE WRIT—
1. The holding of the Court of Appeals voiding the University of Missouri's content-based regulation restricting expression is entirely consistent with, and indeed mandated by, the decisions of this Court 11
2. This Court has consistently afforded religious expression the highest degree of protection from government interference 12
3. The case presents no new Establishment clause issues 13
4. Missouri's interest in requiring strict separation of church and state does not validate the University's policy of discriminating against religious expression 16
5. The frequency of religious uses of the University facilities should not be at issue in the present case 17
CONCLUSION 18

TABLE OF AUTHORITIES

CASES

Americans United v. Rogers, 538 S.W. 2d 711 (Mo.), cert. denied, 429 U.S. 1029 16
Cantwell v. Connecticut, 310 U.S. 296 ..... 12, 17
Carey v. Brown, ... U.S. ....., 65 L. Ed. 2d 263 ..... 11, 12

Consolidated Edison v. Public Serv. Comm'n, ... U.S. ....., 65 L. Ed. 2d 319 12
Cox v. Louisiana, 379 U.S. 536 12
Fowler v. Rhode Island, 345 U.S. 67 ..... 12, 13
Gay Lib v. University of Missouri, 558 F.2d 848 (8th Cir.), cert. denied, 434 U.S. 108, reh. denied, 435 U.S. 981 7
Harfst v. Hoegen, 163 S.W. 2d 609 (Mo.) 16
Hudgens v. NLRB, 424 U.S. 507 12
Kunz v. New York, 340 U.S. 290 15
Lemon v. Kurtzman, 403 U.S. 602 13
Mallory v. Barrera, 544 S.W. 2d 556 (Mo.) 16
Murdock v. Pennsylvania, 319 U.S. 105 12
NAACP v. Alabama, 357 U.S. 449 13
Niemotko v. Maryland, 340 U.S. 268 ..... 12-13, 15
Papish v. Board of Curators of the University of Missouri, 410 U.S. 667 7
Paster v. Tussey, 512 S.W. 2d 97 (Mo.), cert. denied, 419 U.S. 1111 16
Police Department of Chicago v. Mosley, 408 U.S. 92 ..... 11, 12
Universtiy of Missouri v. Dalton, 456 F.Supp. 985 7
Walz v. Tax Commission, 397 U.S. 664 14

CONSTITUTIONAL PROVISIONS

First Amendment, United States Constitution ..... *passim*
Equal Protection Clause, Fourteenth Amendment, United States Constitution ..... *passim*

No. 80-689

In the Supreme Court of the United States

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GARY E. WIDMAR, et al.,
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vs.

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MOTION OF BIBLE STUDY,
a student organization at the University of Missouri at St. Louis, et al.
FOR LEAVE TO FILE BRIEF
AMICUS CURIAE

Comes now BIBLE STUDY, a recognized student organization of the University of Missouri at St. Louis, and moves, pursuant to Supreme Court Rule 42, for leave to file the accompanying brief Amicus Curiae in opposition to Petitioner's Petition for Certiorari.

In support of this motion counsel for Amicus Curiae states that she has obtained the written consent of counsel for Respondents to file this brief, but that counsel for

Petitioners has advised the undersigned by letter that "it is the policy of our office [Office of General Counsel, University of Missouri] not to consent to the filing of Amicus briefs in cases to which the University of Missouri is a party", and accordingly consent was denied. Therefore, the Court's permission is required to file the accompanying brief.

Bible Study, by leave of the Court of Appeals, filed a brief and a reply brief Amici Curiae with Cornerstone and the Christian Legal Society, religiously oriented student organizations at the University of Missouri at Kansas City, in the court below.

Bible Study has been an officially recognized student organization since at least 1976. The organization is distinguishable from Cornerstone and other student religious organizations in that its activities consist almost exclusively of reading the Bible and exchanging individual interpretations of the meaning of the passages under study. It encourages members of all religious faiths and those of no religious faith to join in its meetings. The members of Bible Study believe that all students can benefit from a better knowledge of the Bible which evolves from the self-teaching which occurs at their meetings.

Between September 28, 1978, and August 21, 1980, Bible Study made repeated requests of the University, its Curators, officers and agents, for permission to use the meeting rooms in the University Center for their meetings. Notwithstanding the University's custom of routinely providing facilities for meetings of officially recognized student organizations, the requests made by Bible Study from September 28, 1978, through August 21, 1980, were denied. Similar requests made by Bible Study prior to September 28, 1978, were approved. The only reason given to the

members of Bible Study for denial of their requests for meeting facilities was that the meeting involved religious teaching and worship contrary to University regulations.

On August 4, 1980, the United States Court of Appeals for the Eighth Circuit ruled that the regulation 4.0314.0107, was invalid. In view of this ruling, Bible Study at the beginning of the academic year in late August submitted a written request to the University for facilities for weekly meetings in accordance with established procedures for submission of such requests. The request was denied on the basis that the Court of Appeals decision was not final.

On September 2, 1980, Bible Study sent telegrams to the members of the Board of Curators and officers of the University again requesting permission to meet in the University Center on September 4, 1980. The telegrams also advised that if the request for meeting space were denied, the members of Bible Study would direct counsel to seek a Temporary Restraining Order.

On September 3, 1980, the Board of Curators adopted a resolution suspending the regulation under review pending final resolution of the issues in this case.

Bible Study's rights to equal facilities for continuation of its study and self-teaching is inextricably entwined in the outcome of this case in this Court. As set forth above, Bible Study's missions and activities differ from those of other student religious organizations because it does not sponsor worship services. Its interests may not be adequately represented by the individual students from another campus who are parties to this action. Nevertheless, it will be bound by any ruling made in this Court, and therefore respectfully requests that leave be granted for filing of the accompanying brief.

Cornerstone and the Christian Legal Society at the University of Missouri at Kansas City, two religiously oriented student organizations, join Bible Study in this motion and accompanying brief.

Respectfully submitted,

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November 26, 1980

BRIEF IN OPPOSITION

STATEMENT OF INTEREST OF AMICI CURIAE

Bible Study is an officially organized student organization at the St. Louis campus of the University of Missouri. It desires a meeting room in the University Center for its weekly meetings. At such meetings a portion of the King James version of the Bible, usually a book, is read by those in attendance. One reader reads aloud and then explains to the others what the portion read means to him. Others then offer their own understanding and interpretation.

Bible Study meetings are open to all who wish to attend. By virtue of the University's ban on religious teaching, it has been forced to conduct its meetings at a private home located near the campus. The tone of its meetings would be more like a seminar than a worship service.

Now that the University is no longer preventing religious teaching by student organizations on campus pending the disposition of this case, Bible Study hopes that more members of the University community will attend this meeting. It has no objection to individuals attending its meeting who desire to learn about the Bible for literary, historical or philosophical reasons, but it hopes that such individuals as they come to understand the Bible better will find it a source of religious faith.

Cornerstone and the Christian Legal Society at the University of Missouri at Kansas City, two religiously oriented student organizations, join Bible Study in this brief.

STATEMENT OF THE CASE

The University of Missouri,[1] a state university and the oldest land-grant college west of the Mississippi River, has four campuses - the original campus in Columbia, another campus at Rolla, and campuses at Kansas City and St. Louis which are commuter oriented, rather than residential as is the case with the first two campuses.

On each campus a large number of student groups exist with a wide variety of special areas of interest. Ethnic organizations, such as Jewish college students, Mexican-American students, and the Afro-American Student Union, focus on issues and concerns of their particular ethnic heritage. There are also political organizations such as Young Socialist Alliance, Women's Union and Young Democrats. There are other groups such as the Fencing Club, Bridge Club, Chess Club, Karate Club, Mortar Board, Omicron Delta Kappa, etc. In the words of a University official, "These groups are formed by students to provide another dimension to the student's life on campus - the extra and co-curricular experience." See memorandum of Assistant Dean Parker quoted in n. 1 of the Slip Opinion, petition Appendix, A-3.

As described in the University bulletin, "Through various organizations, boards and committees, cultural, social, educational and recreational programming is provided. The aim is to make student free time activity, a cooperative aid to academic study. . . . Student programs in the University Center often include lectures, symposia, con-

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1. The petitioners are officials and Curators of the University of Missouri and will be referred to as the University of Missouri or the University. The respondents are students at the University's branch in Kansas City which is often referred to as UMKC.

certs, discussions, receptions, chess and bridge tournaments, as well as other events . . .".

Notwithstanding the high value which the University places on the extra-curricular activities promoted by student organizations, the University has a tradition of denying facilities to students and organizations advocating points of view which the University finds objectionable. Frequently individuals and organizations in the University community have had to turn to the courts to obtain permission to express views on campus which the University has proscribed. In *Papish v. Board of Curators of the University of Missouri*, 410 U.S. 667, 671, this Court reminded the University that the ". . . First Amendment leaves no room for the operation of a dual standard in the academic community with respect to the content of speech . . ." and prevented the University from expelling a graduate student for distributing a newspaper on campus which contained a political cartoon and story which the University considered "indecent". In *Gay Lib v. University of Missouri*, 558 F.2d 848 (8th Cir., 1977), cert. denied, 434 U.S. 108, reh. denied, 435 U.S. 981, the Court of Appeals held that the University was prevented from withholding official recognition of a student organization because the University disagreed with the views which the organization would express. It noted that "it is . . . axiomatic that the First Amendment must flourish as much in the academic setting as elsewhere . . . to invoke censorship in an academic environment is hardly the recognition of a healthy democratic society." Most recently in *University of Missouri v. Dalton*, 456 F.Supp. 985, the district court found that the University violated the First Amendment and the Equal Protection clause of the Fourteenth Amendment by denying meeting rooms to a faculty organization which advocated changing the Missouri laws on collective bargaining by public employees.

In the present case the expression which the University finds objectionable is "religious worship" and "religious teaching". University Regulation 4.0314.0107 provides that "No University buildings or grounds (except chapels as herein provided) may be used for purposes of religious worship or religious teaching by either student or non-student groups. . . .".[2] The text of the regulation goes on to provide as the rationale for the regulation: "The general prohibition against use of University buildings and grounds for religious worship or teaching is a policy required, in the opinion of the Board Curators, by the Constitution and Laws of the State and is not open to any other construction."

The regulation does permit the offering of prayer at public functions held in the University facilities, and Regulation 4.0314.0108 provides that "regular chapels established on the university grounds may be used for religious services but not for regular recurring services of any group. . .". The University does not have chapels on its Kansas City and St. Louis campuses.

As stated by the court below:

> The University's enforcement of this regulation began with Cornerstone's January 5, 1977, request to continue its use of a particular lecture hall for Saturday night meetings during the spring term. On the University's request form, Cornerstone stated that its purpose was to "promote a knowledge of Jesus Christ among students" and listed the subject of the proposed meetings to be "various topics relating to Christianity and the Bible." The request stated that the meetings and events would be open to the public, no University

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2. The full text of Regulations 1.0314.0107-.0108 is set forth in the Petition at pp. 3-4, and in the opinion below, slip opinion 5-6, petition Appendix, A-4-A-5.

funds would be used, no admission would be charged and no donations would be solicited. The Dean of Students met with Cornerstone representatives and requested more information regarding the nature and purpose of their meetings. In response, Cornerstone's attorney submitted a letter containing this direct and candid description:

> Typical Cornerstone meetings in University facilities usually include the following:
>
> 1. The offering of prayer;
>
> 2. The singing of hymns in praise and thanksgiving;
>
> 3. The public reading of scripture;
>
> 4. The sharing of personal views and experiences (in relation to God) by various persons;
>
> 5. An exposition of, and commentary on, passages of the Bible by one or more persons for the purpose of teaching practical biblical principles; and
>
> 6. An invitation to the interested to meet for a personal discussion.
>
> As you probably already know, these meetings are open to the public. Any students, be they Jewish, Christian, Moslem, or any other persuasion are invited, and, in fact, actively recruited by the students in Cornerstone.
>
> Although these meetings would not appear to a casual observer to correspond precisely to a traditional worship service, there

> is no doubt that worship is an important part of the general atmosphere. There also is no doubt that the undecided and the uncommitted are encouraged and challenged to make a personal decision in favor of trusting in Jesus Christ both for salvation and for the power to live an abundant Christian life on earth.
>
> There are no collections or solicitations of funds at these meetings, and there are no specific rituals or practices of any particular denomination or sect.

Eleven student members of Cornerstone initiated this action in the district court, alleging that the University, by denying facilities for meetings, violated their rights to free exercise of religion, freedom of speech and equal protection of the law.

The case was submitted to the district court on cross motions for summary judgment based on stipulated facts. The district court granted summary judgment in favor of the University. The court found "that the university's present ban on religious services in its buildings is *required* by the establishment clause". 480 F.Supp. 907, 916, petition Appendix, A-42, emphasis added. With respect to the free speech claims the court concluded that "speech with religious content cannot be treated the same as any other form of speech", id. at 918, A-47, and that "secular intellectual liberties" were entitled to a higher degree of protection than "religious activity", id. at 918, A-47.

The court of appeals reversed. It held:

> UMKC has the right, as do all public universities, to recognize student groups that seek to associate for the advancement of any and all ideas. It has exer-

cised this right and has opened certain of its facilities to recognized student groups for lectures, discussions, symposiums, meetings, events and programs. But UMKC has denied access to these facilities to one such recognized student group based solely on its conclusion that the group's meetings include either religious worship or religious teaching. This denial clearly burdens the constitutional rights of the group's members and is not justified by a compelling state interest in avoiding an establishment of religion. A neutral accommodation of the many student groups active at UMKC would not constitute an establishment of religion even though some student groups may use the University's facilities for religious worship or religious teaching. Therefore, UMKC's regulation No. 4.0314.0107, which prohibits religious worship and religious teaching in the University's buildings or on its grounds, is not required by the Establishment Clause. Because of the burden it imposes on the rights guaranteed to the appellants by the First and Fourteenth Amendments of the federal Constitution, the regulation is invalid.

REASONS FOR DENYING THE WRIT

1. The holding of the Court of Appeals voiding the University of Missouri's content-based regulation restricting expression is entirely consistent with, and indeed mandated by, the decisions of this Court. Last term the Court again recognized: "Once a forum is opened up to assembly or speaking by some groups, government may not prohibit others from assembling or speaking on the basis of what they intend to say." *Carey v. Brown,* ..... U.S. ....., 65 L. Ed. 2d 263, 271, quoting *Police Department of Chicago v. Mosley,* 408 U.S. 92, 95-96. The right of speakers and

listeners to be free of government imposed content-based restrictions on expression in public forums is guaranteed by the Equal Protection clause of the Fourteenth Amendment, *Carey v. Brown*, supra at 65 L. Ed. 2d 270-271; *Police Department of Chicago v. Mosley*, supra; *Cox v. Louisiana*, 379 U.S. 536, 581 (Black, J., concurring). That right of speakers and listeners is also guaranteed by the First Amendment, e.g., *Hudgens v. NLRB*, 424 U.S. 507, 520; see also, concurring opinion of Mr. Justice Stewart in *Carey v. Brown*, supra 65 L. Ed. 2d 276-277.

It is precisely a content-based restriction on the use of its public facilities which the University of Missouri seeks to enforce by the regulation that is in issue in this case. The University makes facilities available routinely to the various campus organizations. Ordinarily the University does not seek to proscribe the expression of campus groups using its facilities; however, the University does not allow expression which the University considers to be "religious worship" or "religious teaching". Such a distinction cannot constitutionally stand. It is immaterial that all "religious worship" or "religious teaching" is proscribed since "[t]he First Amendment's hostility to content-based regulation extends not only to restrictions on particular viewpoints, but also to prohibition of public discussion of an entire topic." *Consolidated Edison v. Public Serv. Comm'n*, ... U.S. ....., 65 L. Ed. 2d 319, 328.

2. This Court has consistently afforded religious expression the highest degree of protection from government interference. In so doing it has relied on the Free Exercise clause of the First Amendment, *Cantwell v. Connecticut*, 310 U.S. 296; the Speech clause of the First Amendment, *Fowler v. Rhode Island*, 345 U.S. 67; *Murdock v. Pennsylvania*, 319 U.S. 105; and the Equal Protection clause of the Fourteenth Amendment, *Niemotko v. Maryland*, 340

U.S. 268, and the concurring opinion of Mr. Justice Frankfurter in *Fowler v. Rhode Island*, supra 345 U.S. at 70.

In short, this Court has always afforded religious expression at least the same degree of protection that it has provided to political, economic and cultural expression, *NAACP v. Alabama*, 357 U.S. 449, 460-461. On the facts of the present case a decision upholding the University regulation would be a departure from such prior decisions and would represent the first time this Court has ever found that religious expression is entitled to less constitutional protection than expression with non-religious content.

3. The case presents no new Establishment clause issues. The University in its statement of the questions presented for its second question presents the issue as being whether the Free Exercise and Speech clauses of the First Amendment take precedence over the Establishment clause of the First Amendment. The Court of Appeals found no conflict between the requirements of the Establishment clause and its holding that the University may not discriminate against religious expression with respect to access to its public facilities. Thus, the University presents a false issue to this Court. What the Court of Appeals did find was that the Establishment clause as well as the other provisions of the First Amendment and the Equal Protection clause required equal treatment of religious and non-religious speech.

In analyzing the Establishment clause issues in the case the court applied the standard three-prong test set out in *Lemon v. Kurtzman*, 403 U.S. 602, 612-613, which this Court has often articulated. It agreed with the district court that, "A [neutral] university policy that permitted *any* student group to meet in university - owned buildings for *any* purpose would aid all student groups, regardless

of religious affiliation and would, therefore, reflect a clear secular purpose. In addition, such a policy would make no distinction between groups for their purposes, entanglement with religion would be completely avoided." Slip Op. 15-16, petition Appendix A-12, quoting 408 F.Supp. at 914, petitioner Appendix A-39 (emphasis in original).

The Court of Appeals also found that a policy which put religious groups on an equal footing with non-religious groups with respect to use of University facilities:

> . . . would have the primary effect of advancing the University's admittedly secular purpose - to develop students' "social and cultural awareness as well as [their] intellectual curiosity." It would simply permit students to put their religious ideas and practices in competition with the ideas and practices of other groups, religious or secular. It would no more commit the University, its administration or its faculty to religious goals than they are now committed to the goals of the Students for a Democratic Society, the Young Socialist Alliance, the Young Democrats or the Women's Union.
>
> Furthermore, a neutral policy would not be an "establishment" as that term was understood by the framers of the First Amendment. "[F]or the men who wrote the Religion Clauses * * * the 'establishment' of a religion connoted sponsorship, financial support, and active involvement of the sovereign in religious activity." *Walz v. Tax Commission*, supra, 397 U.S. at 668. Under a neutral policy, the University would not sponsor religious worship or teaching; sponsorship would lie with the recognized student groups. Financial support would be minimal. Finally, there would be no active involvement of the sovereign because the University's role would be limited to de-

termining the time, place and manner of the event and would not extend to approval or disapproval of content.

In contrast with a neutral policy, UMKC's current regulation has the primary effect of inhibiting religion, an effect which violates the Establishment Clause just as does governmental advancement of religion. *Lemon v. Kurtzman*, supra, 403 U.S. at 612-613. The University's policy singles out and stigmatizes certain religious activity and, in consequence, discredits religious groups.

Slip Op. 15-16, Petition Appendix A-13-14.

For the Court of Appeals to have ruled otherwise would by necessity mean that no public facilities could be used for religious expression consistent with the Establishment clause. Such a holding would come as a shock to other public universities, not to mention cities and counties, which allow religious organizations the same access to meeting facilities as other groups. It would require a government hostility to religion unprecedented in a free society.

This Court has never found that the Establishment clause conflicts with the First Amendment freedoms of speech and assembly. The fact that the state permits religious activities in its streets - *Kunz v. New York*, 340 U.S. 290, parks - *Niemotko v. Maryland*, 340 U.S. 268, or in its other public forums does not present a legitimate Establishment clause issue.

4. Missouri's interest in requiring strict separation of church and state does not validate the University's policy of discriminating against religious expression.

The Curators of the University of Missouri assert that the Missouri Constitution requires the policy of denying access to University facilities for religious expression. However, the Curators read the Missouri Constitution in a way which finds no support in the reported state cases, and in a way which is not clearly mandated by any demonstrable textual provisions of the State Constitution. While it is true that the Missouri Constitution fosters a strict policy of separating church and state, stricter in some instances than the Establishment clause requires, it simply is not a fair reading of the State Constitution or its judicial gloss to hold that a public facility can never be used for religious teaching or worship.[3]

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3. Of the four state cases cited by the petitioners, three involve aid to elementary and secondary schools: *Harfst v. Hoegen*, 163 S.W. 2d 609 (Mo.), held that a parish religious school taken over by the public school district was on the facts of the case, still operated as a religious school; *Paster v. Tussey*, 512 S.W. 2d 97 (Mo.), cert. denied, 419 U.S. 1111, held that a state statutory scheme which authorized the "loaning" of textbooks to students and teachers attending private elementary and secondary schools was unconstitutional; and, *Mallory v. Barrera*, 544 S.W. 2d 556 (Mo.), held that the state could not administer federal funds intended for private school students.

In the other state case cited by the University, *Americans United v. Rogers*, 538 S.W. 2d 711 (Mo.), cert. denied, 429 U.S. 1029, the Court *upheld* a tuition grant program for students attending private colleges and universities. The Court stated, 538 S.W. 2d at 722:

> In doing so, we take solace in the fact that that the parochial school cases with which this court has dealt in the past involved completely different types of educational entities than the colleges and universities herein involved. As suggested by the proponents: "Institutions of higher education are able to boast of academic freedom, institutional independence, objective instruction, lack of indoctrination, faculty autonomy, mature students and a diversity of religious background in faculty and students."

The University's own policy of allowing some religious worship and teaching in the single chapel which the University maintains on its Columbia campus, plus the University's recognition that "[n]o regulations shall be interpreted to forbid the offering of prayer or other appropriate recognition of religion at public functions held at University facilities" suggests that it is not the State Constitution which the University is protecting by its regulation, but the Curators' own policy choice concerning religious activities.

In any event, whether the asserted state interest is constitutional or merely administrative policy, it does not support the denial of what would otherwise be regarded as freedoms secured by the Federal Constitution. As this Court noted in *Cantwell v. Connecticut*, 310 U.S. 296, 308, - ". . . the state may not unduly suppress free communication of views, religious or other, under the guise of conserving desirable conditions."

5. The frequency of religious uses of the University facilities should not be at issue in the present case. The University asserts in its first and fourth Questions Presented that "regular" religious uses of its facilities are at issue. The University has modified its position since the Court of Appeals where its object was to suppress all religious use of its facilities and not merely "regular" uses.

The word regular is not defined in the context of this case, but since the University provides its facilities for hundreds, if not thousands, of different meetings in the course of an academic year, we fail to see the materiality of the frequency a group proposes to meet. The issue might be different if the question concerned a religious group which attempted to monopolize the only available auditorium in a community every Sunday for

its weekly service, but in the hustle and bustle of University activities, limiting religious uses alone to non-regular uses appears trivial and arbitrary. The University has made no claim that a limitation on religious uses is necessary to make facilities available for competing demands and no reason is advanced why religious organizations should be restricted in the number of uses they can make of University facilities when other groups are not similarly limited. Since the University has full authority to impose reasonable restrictions concerning time, place and manner on the use of its facilities, there is no reason why religious activities should be treated differently than other activities.

CONCLUSION

For the foregoing reasons the petition for writ of certiorari should be denied.

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